UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| In re: EDWARD RULAND | | BANKRUPTCY CASE |
|----------------------|--------|-----------------|
| | Debtor | NO.: 16-18504 |
| | | CHAPTER 13 |
| | | I |

CERTIFICATION OF NO RESPONSE and REQUEST FOR ENTRY OF STAY RELIEF ORDER

- I, Peter E. Meltzer, counsel for CadlerRock Joint Venture, L.P., hereby certify that:
- 1. On August 8, 2018, I caused to be served on the Debtor, Debtor's counsel and the Trustee the Motion of Movant for Stay Relief in the above matter, a proposed form of Order and the Notice of Response Deadline and Hearing Date. I filed a Certificate of Service with the Court on the same date indicating service of the above documents on the above individuals.
- 2. Under the Notice of Motion, a response was due on or before August 29, 2018.
- 3. A hearing on Movant's Motion is scheduled for September 6, 2018.
- 4. No response was filed by the Debtor to the Motion as of the date hereof.
- 5. Based on the foregoing, it is hereby respectfully requested that Movant's Motion for Relief from Stay be granted.

WEBER GALLAGHER SIMPSON STAPLETON FIRES & NEWBY, LLP

Dated: September 5, 2018 _____/s/ PETER E. MELTZER

Peter E. Meltzer, Esquire 2000 Market Street, 13th Floor Philadelphia, PA 19103 267-295-3363 Attorneys for Movant